

**UNITED STATES BANKRUPTCY COURT  
FOR THE DISTRICT OF NEW JERSEY**

SADEK & COOPER  
1315 Walnut Street, Ste 502  
Philadelphia, PA 19107  
(215) 545-0008  
Attorneys for Debtors

In re:	:	IN BANKRUPTCY
	:	CHAPTER 13
Angela R. Thomas	:	
	:	CASE NO. 20-22347 (JNP)
	:	HEARING DATE: August 31, 2021 @ 11:00 am
	:	ORAL ARGUMENT WAIVED

**NOTICE OF MOTION TO APPROVE MORTGAGE MODIFICATION**

TO:

United States Trustee's Office  
One Newark Center, Suite 2100  
Newark, NJ 07102

Isabel C. Balboa  
Chapter 13 Standing Trustee  
535 Route 38, Ste 580  
Cherry Hill, NJ 08002

MidFirst Bank  
Attn: Agent/General Agent/Bankruptcy Dept/President  
999 NorthWest Grand Blvd.  
Oklahoma City, OK 73118

MidFirst Bank  
C/O KML Law Group  
701 Market St., Ste 5000  
Philadelphia, PA 19106

PLEASE TAKE NOTICE that on August 31, 2021 at 11:00 am in the forenoon, or as soon thereafter as counsel may be heard, the undersigned attorney for Debtor(s) will move before the Honorable Judge Jerrold N. Poslusny, United States Bankruptcy Judge, United States Bankruptcy Court, 400 Cooper Street, Camden, NJ 08101, Courtroom 4C, for an ORDER APPROVING

MORTGAGE MODIFICATION.

PLEASE TAKE FURTHER NOTICE that if you contest this motion, you must appear in Court on the date noted above AND you are further required to file with the Court and serve on the undersigned a written response no later than seven (7) days prior to the hearing date set forth herein.

Pursuant to the D.N.J. LBR 9013-2, the undersigned counsel certifies that no brief is required, as the issues are primarily factual and the facts necessary to rule on this motion have been set forth in the attached Certification. Counsel further requests that this matter be heard on the papers unless the Court requests oral argument.

Sadek and Cooper Law  
Attorneys for Debtor(s)

Dated: July 29, 2021

/s/ Jeanie D. Wiesner  
Jeanie D. Wiesner, Esq.